

2017

## 2017 Pesticide Safety - Pesticide Registration Process

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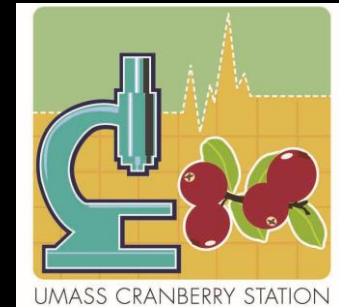
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# PESTICIDE REGISTRATION



For Minor Crops

Hilary Sandler, UMass Cranberry Station

Pesticide Safety Meeting

April 27, 2017

Wareham, MA



- USDA
  - ▣ NIFA, ARS
- EPA
- State Agricultural Expt. Stations
- Agrochemicals industry
- Consumers, Food Producers, and Commodity Producers

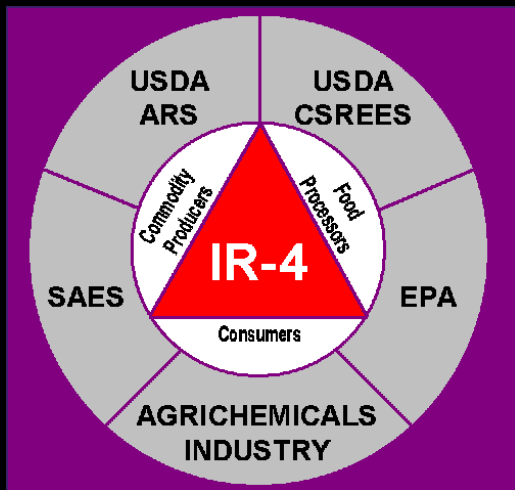
USDA

IR 4

State Land Grant  
Universities

The only **publicly funded** program that conducts research & submits petitions to EPA for registration of pest control products.





# IR-4 MISSION

Provide pest management solutions to growers of fruits, vegetables & other minor crops for the benefit of consumers, growers & food processors.

# What is a minor crop ??

**high value / low acreage**

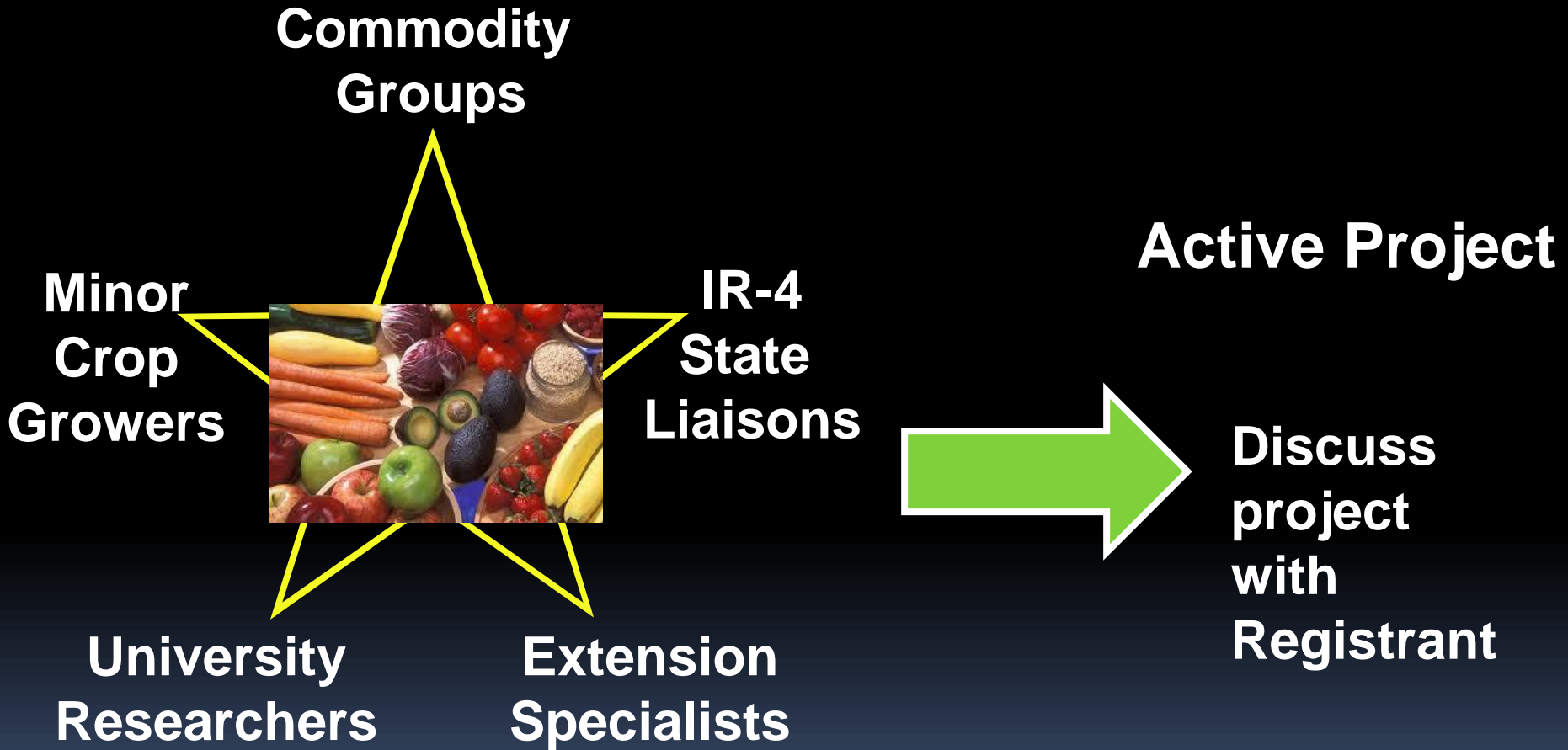


**Fruits  
Vegetables  
herbs  
ornamentals**



# Beginning an IR4 Project

## Food Use Workshops / Nomination / Prioritization



# Beginning an IR4 Project

## **Food Use Workshops / Nomination / Prioritization**

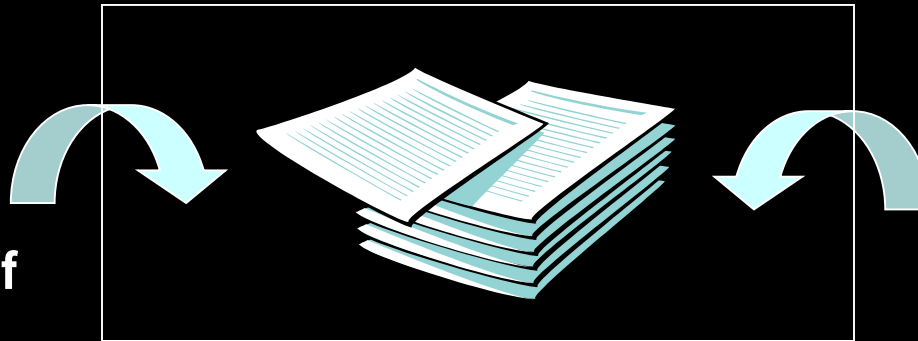
- Availability and efficacy of alternative pest management tools
- Pest damage potential of target pest(s)
- Performance and crop safety of the chemical tool in managing the target pest(s)
- Compatibility of the proposed chemical candidate with IPM
- Categorized as "A" and/or "B"



# Research Planning

**Annual Food Use Workshop: Where active projects are prioritized**

- Growers
- Commodity groups
- University Staff



- EPA
- Crop Protection Industry
- University Staff
- USDA-ARS and CSREES

**Regional Field Coordinators /  
Headquarters Coordination**

**PCR**

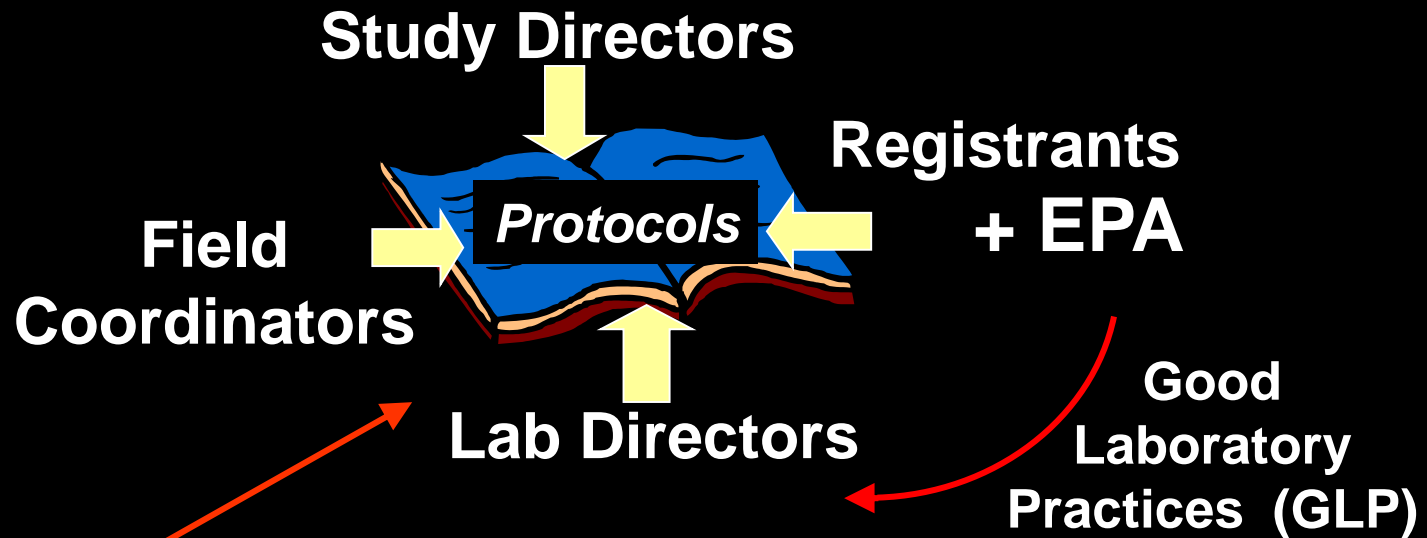
Project Clearance  
Request form

**National Research Planning**

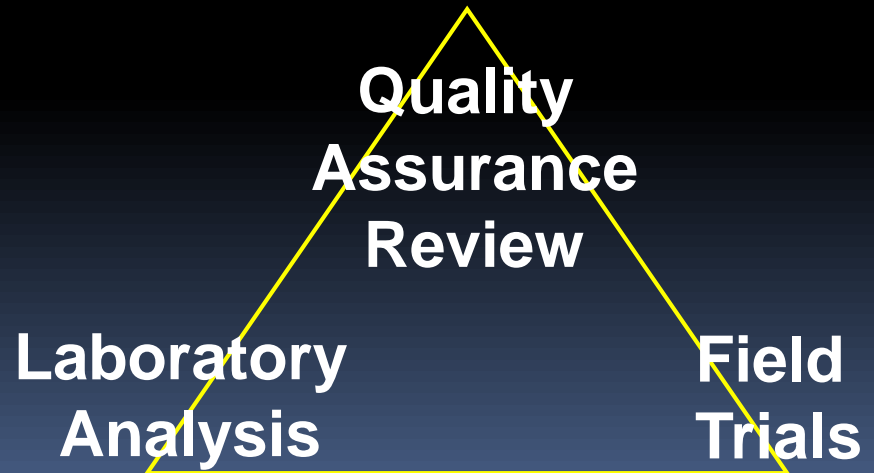


**Where research projects are  
designated for the coming year**

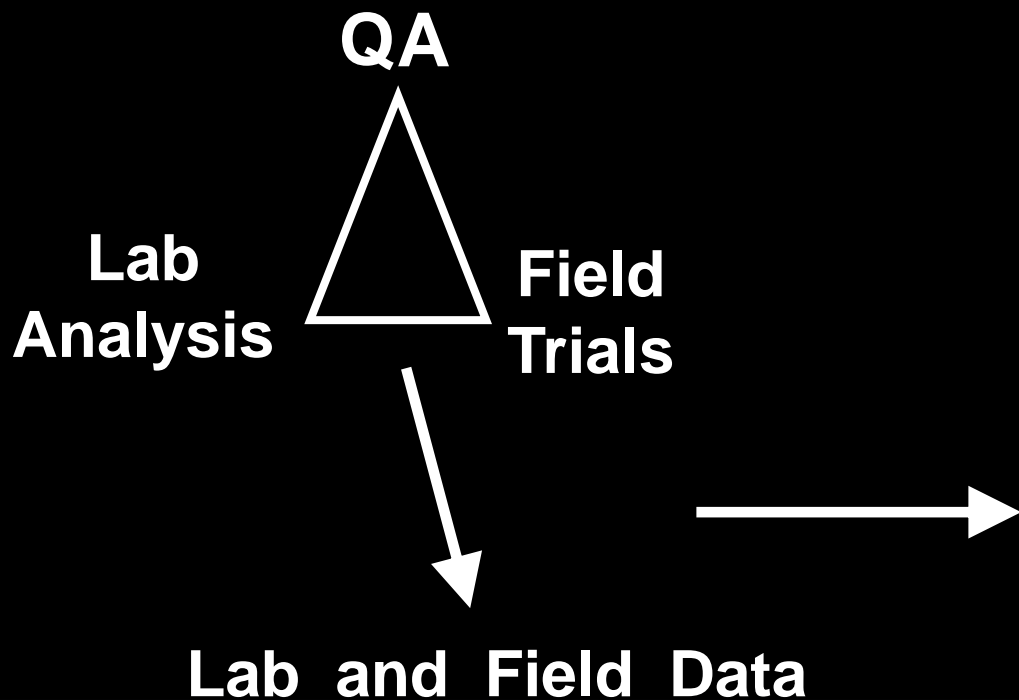
# Developing Data from Projects



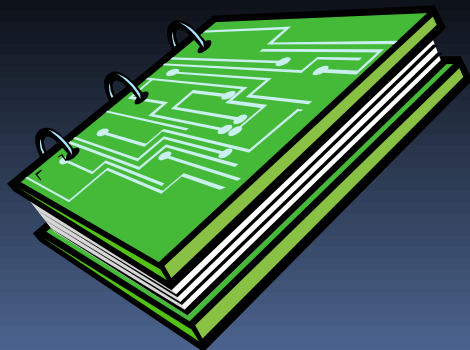
Lab / Field Protocols are developed for each project



# Preparation of EPA Petition



- Study Directors Review
- Quality Assurance Review
- Registrant Review



# Product Registration

Petition sent to EPA  
and reviewed



If all is in order, **tolerance is granted** (MRL)  
and registration follows.



**New product is now available  
for minor use.**

# SECTION 18 PROCESS



Authorizes EPA to allow  
States to use a pesticide  
for an unregistered use  
for a limited time if EPA  
determines that Emergency  
Conditions exist.

“Section 18” refers to the part of FIFRA that permits the above use.

# Emergency Exemptions

- Urgent and non-routine situation
- No feasible alternative exists
- New pest that will cause significant economic loss or risk to environment and/or human health
- Emergency may also be justified if:
  - Pesticide resistance exists
  - Unusual weather leads to pest outbreak
  - Effective product label is cancelled



# Process for S18s



- Contact MDAR
  - Submit written request to MDAR
  - Approval by Pesticide Board Subcommittee
  - Submitted to EPA by MDAR
  
- Contact manufacturer
  - Must be in agreement and support use



# Requirements



- Limited time and use only.
- Must clearly demonstrate emergency conditions exist.
- Tolerances (max residue levels) must be established under FQPA.
- EPA to respond within 50 days of receipt.

# Crisis Exemptions



- Attend to an immediate need.
- Issued by the state agency, allows for unregistered use for 15 days.
- Must coordinate with MDAR, EPA, and chemical company.

# Crisis Exemption

- EPA performs cursory review to ensure no initial concerns.
- If concerns are noted, EPA confers with MDAR until resolved.
- Time-limited tolerance is published in the Federal Register.

# Section 18s in Cranberry

- Avaunt for CB weevil
- Kerb 50WP for dodder
- QuinStar 4L for dodder
- Stinger for broadleaved weeds
- Confirm for Sparganopsis
- Pyramite for Southern red mite
- Spintor for Sparganopsis
- Bravo for twig blight (OR)
- Ridomil for Phytophthora

For MA, unless otherwise stated.

Likely not an exhaustive list; from 1990 to present

# Section 18 for Kerb SC denied in 2017

- Dodder not viewed as “non-routine”
  - Been a problem for a long-time
  - Yields (state average) have been stable
- Did not meet EPA criteria for EE
- Dow pursuing full label (Section 3) for 2<sup>nd</sup> quarter 2018.

# APPLICATION FOR 24(C)

## Special Local Needs



University of  
Massachusetts  
Amherst



States may register an additional use of federally registered pesticide, or new end-use product to meet Special Local Needs.



# Candidates for a 24(c)

- New method or timing of application
- New crop / new site
- New pest
- Changed rate
- Application in particular soil type
- New product or formulation
- Product useful in managing resistance



# The Process

- Chemical company submits a package to MDAR requesting SLN with residue data, etc.
- University specialist must submit form with target pests and need for additional label language.
- States have authority to issue SLNs, while EPA is responsible for overseeing program.
- SLN in effect until / unless EPA mandates otherwise.

# The Process

- EPA reviews these registrations
  - May disapprove if use not covered by necessary tolerances or if use has been previously denied or cancelled
  - Usually relates to health concerns



# Restrictions

- Time - limited label is encouraged but may be in effect for 5-10 years.
- Companies must re-register for new supplemental label
  - Pay fee
  - Update data package



# 24(c) (SLN) in Cranberry

- Weedar 64: wiper application to tall weeds
- Diazinon: reduction of PHI for Spag/CFW
- Devrinol 50DF: loss of Devrinol 10G, multiple applications on new plantings
- QuinStar: injection timing
- Callisto: chemigation, reduced use of adjuvants, spot application
- Devrinol DF-XT (as with 50DF)

For MA, unless otherwise stated.

Likely not an exhaustive list; from 1990 to present

# New 24(c) for MA in 2017

- Devrinol 2XT: multiple applications permitted for use on New Plantings.
  - Up to 18 qt/A per year
- Intensity / Intensity One: Chemigation now allowed. Only Grass herbicide that can be chemigated!!
  - ▣ Select and Poast CANNOT be chemigated

# Other Label Types

- **Section 3:** Full label / Master label / EPA stamped label / reference label
- **Supplemental label:** may contain instructions not present in full label
  - EPA urges incorporation of supplemental language into full label within 18 months or with next label printing, whichever comes first.

